

STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE: APPLICATION OF
NEW DIMENSION COMMUNICATIONS, INC.
D/B/A FAST PHONES FOR CERTIFICATION AS
AN ELIGIBLE TELECOMMUNICATIONS
CARRIER

198100
BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 314 - C

(Please type or print)

Submitted by: Angela Janssen

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☐ Electric

☐ Affidavit

☐ Letter

☐ Request

☐ Electric/Gas

☐ Agreement

☐ Memorandum

☐ Request for Certification

☐ Electric/Telecommunications

☐ Answer

☐ Motion

☐ Request for Investigation

☐ Electric/Water

☐ Appellate Review

☐ Objection

☐ Resale Agreement

☐ Electric/Water/Telecom.

☐ Application

☐ Petition

☐ Resale Amendment

☐ Electric/Water/Sewer

☐ Brief

☐ Petition for Reconsideration

☐ Reservation Letter

☐ Gas

☐ Certificate

☐ Petition for Rulemaking

☐ Response

☐ Railroad

☐ Comments

☐ Petition for Rule to Show Cause

☐ Response to Discovery

☐ Sewer

☐ Complaint

☐ Petition to Intervene

☐ Return to Petition

☐ Telecommunications

☐ Consent Order

☐ Petition to Intervene Out of Time

☐ Stipulation

☐ Transportation

☐ Discovery

☒ Prefiled Testimony

☐ Subpoena

☐ Water

☐ Exhibit

☐ Promotion

☐ Tariff

☐ Water/Sewer

☐ Expedited Consideration

☐ Proposed Order

☐ Other:

☐ Administrative Matter

☐ Interconnection Agreement

☐ Protest

☐ Other:

☐ Interconnection Amendment

☐ Publisher's Affidavit

☐ Late-Filed Exhibit

☐ Report

RETURN DATE: OK D. Duke
SERVICE: OK D. Duke

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November 17, 2008

VIA OVERNIGHT DELIVERY

Mr. Charles Terreni
Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

Re: New Dimension Communications, Inc. d/b/a Fast Phones
Docket No. 2008-314-C

Dear Mr. Terreni:

Pursuant to letter dated August 18, 2008 in the above-referenced docket, enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,


Lance J.M. Steinhart
Attorney New Dimension Communications, Inc. d/b/a Fast Phones

cc:

Lessie Hammonds – ORS via e-mail: lhammon@regstaff.sc.gov

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IN RE: APPLICATION OF)
NEW DIMENSION COMMUNICATIONS,)
INC. D/B/A FAST PHONES)
FOR CERTIFICATION AS AN ELIGIBLE) DIRECT TESTIMONY
TELECOMMUNICATIONS CARRIER) OF WAYNE GREEN

1 **Q: PLEASE STATE YOUR NAME, YOUR POSITION WITH NEW**
2 **DIMENSION COMMUNICATIONS, INC. D/B/A FAST PHONES AND**
3 **YOUR BUSINESS ADDRESS.**

4 **A:** My name is Wayne Green. My title is President of New Dimension
5 Communications, Inc. d/b/a Fast Phones (hereinafter sometimes referred to as
6 “New Dimension”). My business address is 134 St. James Avenue, Unit 2,
7 Goose Creek, South Carolina 29445.

8 **Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND**
9 **AND EXPERIENCE.**

10 **A:** My background and experience is attached hereto as Exhibit A.

1

2 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 **A:** The purpose of my testimony is to demonstrate that New Dimension meets the
4 state and federal requirements for designation as an Eligible Telecommunications
5 Carrier (“ETC”) in the State of South Carolina in the designated areas of
6 BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T”) service territory (the “Designated Service Area”). A List of Wire Centers is
7 attached as Exhibit 1 to our application filed in this Docket.
8

9 **Q: DOES NEW DIMENSION CURRENTLY PROVIDE**
10 **TELECOMMUNICATIONS SERVICE IN SOUTH CAROLINA?**

11 **A:** Yes. New Dimension was granted a Certificate of Public Convenience and
12 Necessity to Provide Competitive Resold Local Exchange Telecommunications
13 Services within the State of South Carolina Pursuant to Order No. 1998-696
14 issued in Docket No. 1998-255-C on September 14, 1998. New Dimension is
15 also a common carrier as that term is defined in 47 U.S.C. §153(10), and New
16 Dimension meets the requirements of 47 U.S.C. § 214(e)(1).

17 **Q: DOES NEW DIMENSION CURRENTLY CONTRIBUTE TO THE**
18 **FUNDING FOR UNIVERSAL SERVICE?**

19 **A:** Yes. Federal regulations require carriers such as New Dimension to contribute a
20 portion of their revenues to the funding of federal universal service.

1

2 **Q: IS THE COMPANY PRESENTLY ABLE TO DRAW FROM FEDERAL**
3 **UNIVERSAL SERVICE FUNDS FOR THE PROVISION OF THE**
4 **SUPPORTED SERVICES IN SOUTH CAROLINA?**

5 **A:** No. Until it is designated as an ETC for those areas it serves in South Carolina,
6 New Dimension is not able to receive any federal universal service funds to
7 support its provision of universal services to South Carolina consumers.

8 **Q: BY OBTAINING ETC DESIGNATION, WILL NEW DIMENSION**
9 **IMPROVE THE QUALITY OF BASIC SERVICE PROVIDED TO SOUTH**
10 **CAROLINA RESIDENTS?**

11 **A:** Yes. As required, if New Dimension receives ETC designation, any universal
12 service funding it receives will be used only to support the provision, upgrading
13 and maintenance of New Dimension's residential network where New Dimension
14 is designated as an ETC in South Carolina. As a result, New Dimension will be
15 able to improve the quality of basic service by increasing the availability of this
16 unique service to customers who reside in areas of the state where the service is
17 currently unavailable and, due to credit and deposit requirements, may not be able
18 to obtain the safety and convenience of telephone service from traditional
19 providers.

20

21 **Q: WILL NEW DIMENSION'S CUSTOMERS EXPERIENCE OTHER**
22 **BENEFITS AS A RESULT OF NEW DIMENSION'S DESIGNATION AS**
23 **AN ETC?**

1 **A:** Yes. Since New Dimension is seeking only low income support, and Lifeline is
2 designed to reduce the monthly cost of telecommunications services for eligible
3 consumers, and is distributed on a per-customer basis and is directly reflected in
4 the price that the eligible customer pays, it is assured that all support received by
5 the carrier is used to provide Lifeline services to consumers, thus promoting
6 Lifeline and the availability of telephone service to low income users, which is
7 clearly in the public interest.

8 **Q: IS A COMPETITIVE LOCAL EXCHANGE CARRIER LIKE NEW**
9 **DIMENSION ELIGIBLE FOR FEDERAL UNIVERSAL SERVICE**
10 **SUPPORT?**

11 **A:** Yes. Both the 1996 Telecommunications Act ("TA'96") and the FCC's rules
12 establish the directives for the Commission to follow in making an ETC
13 designation. Section 214(e) of TA'96 specifically provides that any common
14 carrier, including a competitive local exchange carrier such as New Dimension,
15 may be designated as an ETC for federal universal service support purposes,
16 provided that carrier meets the specific criteria set forth in Section 214(e)(1) of
17 the Act, which New Dimension does.

1

2 **Q: WHAT ARE THE REQUIREMENTS FOR OBTAINING ETC**
3 **DESIGNATION?**

4 **A:** The eligibility requirements were recently supplemented by the FCC. The initial
5 requirements established by §214(e)(1) of the Act are still in place, and state:

6 A common carrier designated as an eligible telecommunications carrier under
7 paragraph (2) or (3) shall be eligible to receive universal service support in
8 accordance with section 254 and shall, throughout the service area for which the
9 designation is received:

1
2 (A) Offer the services that are supported by Federal universal service support
3 mechanisms under Section 254(c), either using its own facilities or a combination
4 of its own facilities and resale of another carrier's services (including the services
5 offered by another eligible telecommunications carrier); and

6
7 (B) Advertise the availability of such services and the charges therefore using
8 media of general distribution.

1

2 **Q: IS NEW DIMENSION REQUESTING DESIGNATION IN THIS**
3 **PROCEEDING FOR THE STUDY AREA OF ANY RURAL LEC IN**
4 **SOUTH CAROLINA?**

5 **A:** No. New Dimension's Petition requests designation only in the wire centers of
6 AT&T which have been classified as non-rural.

7 **Q: DOES NEW DIMENSION CURRENTLY HAVE INTERCONNECTION**
8 **AGREEMENT WITH AT&T?**

9 **A:** Yes.

10 **Q: IS IT YOUR UNDERSTANDING THAT NEW DIMENSION IS**
11 **ENTITLED TO BE DESIGNATED AS AN ETC IF IT DEMONSTRATES**
12 **THAT IT IS CAPABLE OF MEETING ALL OF THE OBLIGATIONS**
13 **IMPOSED BY SECTION 214(e) OF TA'96 AS WELL AS THE NEW**
14 **REQUIREMENTS ESTABLISHED BY THE FCC'S MARCH, 2005**
15 **ORDER?**

16 **A:** Yes. New Dimension has also attached as Exhibit B an Affidavit in support of its
17 requirements for designation as an Eligible Telecommunications Carrier.

1 **Q: THE FIRST CRITERION FOR ETC DESIGNATION UNDER SECTION**
2 **214(e)(1) IS COMMON CARRIER STATUS. IS NEW DIMENSION A**
3 **COMMON CARRIER?**

4 **A:** Yes. New Dimension is a "common carrier" for purposes of obtaining ETC
5 designation under 47 U.S.C. § 214(e)(1). A common carrier is generally defined
6 in 47 U.S.C. §153(10) as "any person engaged as a common carrier for-hire" in
7 interstate or foreign communications utilizing either wire or radio technology,
8 except for radio broadcasters.

9 **Q: THE SECOND REQUIREMENT IS THAT NEW DIMENSION OFFER**
10 **THE "SUPPORTED SERVICES." WHAT ARE THE SUPPORTED**
11 **SERVICES THAT MUST BE OFFERED?**

12 **A:** The FCC has identified (at 47 C.F.R. §54.101(a)) the following services and
13 functionalities as the core services to be offered by an ETC and supported by
14 federal universal service support mechanisms:

- 15 1. voice-grade access to the public switched network;
16 2. local usage;
17 3. dual tone multi-frequency signaling or its functional equivalent;
18 4. single-party service or its functional equivalent;
19 5. access to emergency services;
20 6. access to operator services;
21 7. access to interexchange services;
22 8. access to directory assistance;
23 9. toll limitation for qualifying low-income consumers

1 **Q: CAN NEW DIMENSION CURRENTLY PROVIDE THE SUPPORTED**
2 **SERVICES SET FORTH ABOVE USING ITS NETWORK THAT IS IN**
3 **PLACE TODAY?**

4 **A:** Yes. New Dimension's present network can provide all of the supported services
5 to consumers in South Carolina. New Dimension recognizes its obligation to offer
6 these services including the "toll limitation for qualifying low-income consumers"
7 service that is linked to the federal "Lifeline" program and targeted at meeting the
8 needs of low-income consumers. New Dimension, however, cannot participate in
9 the federal Lifeline program until it receives its ETC designation. Once New
10 Dimension receives ETC designation it will provide toll limitation as required by
11 the FCC's rules.

12 **Q: COULD YOU EXPLAIN EACH OF THE SUPPORTED SERVICES AND**
13 **HOW NEW DIMENSION PROVIDES, OR WILL PROVIDE THESE**
14 **SERVICES?**

15 **A:** Yes. New Dimension presently provides or plans to provide each of the supported
16 services identified by the FCC in 47 C.F.R. § 54.101(a) as follows:

17
18 a. *Voice-grade access to the public switched telephone network.* The
19 FCC has concluded that voice grade service means the ability to make and
20 receive phone calls, within a specified bandwidth and frequency range.
21 New Dimension meets this requirement by providing voice-grade access
22 to the public switched telephone network. Through its interconnection
23 agreements, all customers of New Dimension are able to make and

1 receive calls on the public switched telephone network within the
2 specified bandwidth.

3 b. *Local usage.* ETCs must include local usage beyond providing
4 simple access to the public switched network as a part of a universal
5 service offering. New Dimension includes specified quantities of usage in
6 its rate plans and thereby complies with the requirement. It is important to
7 note, that currently, there is no specific rule that requires an ETC to
8 include any particular amount of local usage, although all of New
9 Dimension' service offerings include unlimited local calling.

10 c. *Dual-tone, multi-frequency ("DTMF") signaling or its functional*
11 *equivalent.* DTMF, more commonly known as touch-tone, is a method of
12 signaling that facilitates the transport of call set-up and detail information.
13 Through its interconnection agreements, New Dimension provides DTMF
14 signaling to its customers, which is the equivalent of that offered by the
15 incumbent LECs to its customers.

16 d. *Single-party service or its functional equivalent.* New Dimension
17 meets the requirement of single-party service by providing a dedicated
18 message path for the length of all customer calls.

1
2 e. *Access to emergency services.* The ability to reach a public
3 emergency service provider by dialing 911 is a requirement in any
4 universal service offering. New Dimension currently provides its
5 subscribers access to 911 emergency service in accord with this
6 requirement, and consistent with FCC Regulations throughout the service
7 area for which designation is sought. New Dimension also provides
8 Enhanced 911 services including Phase I and Phase II E911 services
9 where requested by local public safety authorities ready to receive the
10 information and where the local exchange carrier supports such services.

11 f. *Access to operator services.* Access to operator services is defined
12 as any automatic or live assistance provided to a consumer to arrange for
13 billing or completion, or both, of a telephone call. New Dimension
14 currently provides access to operator services though a 1-800 calling
15 service. Customers can also obtain 1+ service through a third party
16 provider to access such services.

17 g. *Access to directory assistance.* Much like operator services, New
18 Dimension currently offers access to directory assistance services though
19 a 1-800 calling service. Customers can also obtain 1+ service through a
20 third party provider to access such services.

21 h. *Access to interexchange service.* New Dimension meets the
22 requirements of access to interexchange service by providing all of its
23 customers with the ability to make and receive interexchange calls

1 through 1+800 calling services provided by third party LD carriers.

2 Additionally, customers can obtain 1+ services through a third party
3 provider, and are able to reach their IXC of choice by dialing the
4 appropriate access code.

5 i. *Toll limitation for qualifying low-income consumers.* As
6 previously mentioned, toll limitation for qualifying low-income
7 consumers is linked to participation in the Lifeline program, which New
8 Dimension will participate in and offer upon designation as an ETC. 47
9 CFR § 54.400(d) defines Toll Limitation” as either toll blocking *or* toll
10 control for telecommunications carriers that are incapable of providing
11 both services. At this time, New Dimension does offer toll control. Per
12 the requirements of 47 CFR § 54.400(d) New Dimension will provide
13 eligible Lifeline subscribers with the ability to subscribe to toll blocking,
14 at no additional charge, which restricts the dialing of toll billed calls while
15 permitting local calls, and non-chargeable calls to company numbers such
16 as repair service, emergency numbers (911) and 800 dialing.

1
2 **Q: DOES NEW DIMENSION OFFER THE ABOVE-REFERENCED**
3 **SUPPORTED SERVICES VIA ITS OWN FACILITIES OR A**
4 **COMBINATION OF ITS OWN FACILITIES AND RESALE OF**
5 **ANOTHER CARRIER'S SERVICES?**

6 **A:** Depending on the type of service the customer requests and the precise location of
7 the customer, New Dimension offers the supported services either through the
8 purchase of switched port/loop combinations Unbundled Network Elements
9 (UNEs) or through resale of another carrier's services. Consistent with the
10 requirements of 47 CFR. § 201(e), these facilities are physical components of the
11 telecommunications network that are used in the transmission or routing of the
12 services for which support is requested. Because these facilities include
13 unbundled network elements, they meet the FCC's definition of "own facilities"
14 established in 47 CFR § 201(f) and thereby make the method by which New
15 Dimension provisions the supported services consistent with the FCC's rules
16 found at 47 CFR § 54.201(d)(1) through (i).

17 **Q: WILL NEW DIMENSION PROVIDE SUPPORTED UNIVERSAL**
18 **SERVICES ONCE DESIGNATED AS AN ETC?**

19 **A:** Yes. New Dimension will provide all supported universal services once
20 designated as an ETC.

1

2 **Q: WILL NEW DIMENSION PARTICIPATE IN THE LIFELINE AND LINK-**
3 **UP PROGRAMS IF IT IS DESIGNATED AS AN ETC?**

4 **A:** Yes, as we stated in our Petition, upon designation as an ETC, New Dimension
5 will participate in, and offer, LifeLine and Link-Up programs to qualifying low-
6 income consumers and publicize the availability of Lifeline and Link-Up services
7 in a manner reasonably designed to reach those likely to qualify for those
8 services, as required by 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d).

9 **Q: A THIRD REQUIREMENT FOR DESIGNATION AS AN ETC IS TO**
10 **ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES.**
11 **HOW DOES NEW DIMENSION INTEND TO ADVERTISE THE**
12 **AVAILABILITY OF THE SUPPORTED SERVICES?**

13 **A:** New Dimension advertises the availability of the supported services and the
14 corresponding charges in a manner that informs the general public within the
15 designated service area of both the services available and the corresponding
16 charges. New Dimension advertises its services through several different media of
17 general distribution including (but not limited to) marketing at targeted retail
18 locations as well as advertisements via television, radio, newspapers and various
19 free publications target at low-income consumers such as the “Dollar Saver”.

1

2 **Q: IS NEW DIMENSION ABLE TO SATISFY EACH OF THE ADDITIONAL**
3 **REQUIREMENTS ESTABLISHED IN THE FCC’S MARCH 17, 2005**
4 **ORDER?**

5 **A:** Yes. New Dimension will provide each of the supported services identified in 47
6 C.F.R. §54.101 as follows:

7 a. New Dimension will commit to provide service throughout its proposed
8 designated service area to all customers making a reasonable request for service.

9 New Dimension certifies that it will (a) provide service on a timely basis to
10 requesting customers within the applicant’s service area where the applicant’s
11 network already passes the potential customer’s premises; and (b) provide service
12 within a reasonable period of time, if the potential customer is within New
13 Dimension’s licensed service area but outside its existing network coverage, if
14 service can be provided at reasonable cost by reselling services from another
15 carrier’s facilities to provide service.

16 b. Under FCC guidelines, an ETC Applicant must submit a five-year plan
17 that describes with specificity proposed improvements or upgrades to the
18 applicant’s network on a wire center-by-wire center basis throughout its proposed
19 Designated Service Area. The only circumstance warranting deviation from this
20 requirement is where an applicant’s requested ETC serving territory would qualify
21 it to receive no “high cost” USF support, but only “low income” USF support.
22 Because New Dimension seeks ETC designation solely for purposes of
23 reimbursement for provision of subsidized Lifeline and Link-Up services to

1 eligible customers, submission of a Five-Year Network Improvement Plan is not
2 required at this time. In lieu of this requirement, New Dimension will fully
3 comply with the requirements of 103-690(C) and hereby submits its two-year
4 Lifeline and Link Up advertising plan that will describe the company's plans for
5 advertising and outreach campaigns aimed at identifying, qualifying, and enrolling
6 eligible participants in the Lifeline and Link Up programs in areas for which it is
7 certified throughout the State of South Carolina. As Lifeline support is designed
8 to reduce the monthly cost of telecommunications services for eligible consumers,
9 and is distributed on a per-customer basis and is directly reflected in the price that
10 the eligible customer pays, it is assured that all support received by the carrier is
11 used to provide Lifeline services to consumers, thus promoting Lifeline and the
12 availability of telephone service to low income users, which is clearly in the
13 public interest. Please see Exhibit C which is attached hereto.

14
15 c. Providing service to its customers through resale of another carrier's
16 services or the use of switched port/loop combination UNEs, leased from the
17 ILECs, allows New Dimension to provide to its customers the same ability to
18 remain functional in emergency situations as currently provided by the ILECs to
19 their own customers (including access to a reasonable amount of back-up power
20 to ensure functionality without an external power source, rerouting of traffic
21 around damaged facilities, and the capability of managing traffic spikes resulting
22 from emergency situations). Further, by nature of the fact that these services are
23 implicitly included in the rates that New Dimension pays to the ILECs, these

1 capabilities are also available to New Dimension's customers.

2 d. New Dimension will satisfy applicable consumer protection and service
3 quality standards. Under FCC guidelines, an ETC Applicant must demonstrate
4 that it will satisfy applicable consumer protection and service quality standards.
5 47 CFR §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such
6 standards. As part of its certification requirements for providing local exchange
7 services, Applicant must abide by the service quality and consumer protection
8 rules. In addition, Applicant commits to reporting information on consumer
9 complaints per 1,000 lines on an annual basis consistent with the FCC's ETC
10 Order. Applicant in general commits to satisfying all such applicable state and
11 federal requirements related to consumer protection and service quality standards.

12 e. New Dimension's offering includes a local usage component with
13 unlimited local calling similar to the ILECs' basic local service offerings. The
14 amount of credits that will be provided to eligible low participating in the lifeline
15 and link-up program, is set forth in proposed tariff revisions, which was attached
16 as Exhibit 2 to our Application in this Docket.

1
2 f. New Dimension acknowledges that the FCC may require it to provide
3 equal access to long-distance carriers in the event that no other eligible
4 telecommunications carrier is providing equal access within the service area.

5 g. As relevant to the Commission's public interest inquiry, New Dimension's
6 presence will undeniably include a benefit of increased customer choice, as New
7 Dimension's service offering is unique, and serves a specific sector of the public
8 who might well not otherwise have wire line telephone service.

9 h. New Dimension does not seek designation below the study area level of a
10 rural telephone company, and therefore, no "cream skimming" analysis is
11 required. Likewise, New Dimension does not seek designation as an ETC for any
12 part of tribal lands. Therefore, the public notice requirements established by the
13 FCC for tribal lands do not apply.

14 **Q: IN WHAT SERVICE AREAS IS NEW DIMENSION SEEKING**
15 **DESIGNATION AS AN ETC?**

16 **A:** Pursuant to Section 54.207 of the FCC's rules, a "service area" is a "geographic
17 area established by a state commission for the purpose of determining universal
18 service obligations and support mechanisms." 47 C.F.R. § 54.207(a). For service
19 areas served by non-rural ILECs such as AT&T, there are no restrictions on how a
20 Commission defines the "service area" for purposes of designating a competitive
21 ETC. New Dimension proposes a service area consisting of each of the AT&T
22 wire centers in South Carolina which are set forth in Exhibit 1 to our Application
23 in this Docket.

1

2 **Q: DOES NEW DIMENSION PROVIDE TELECOMMUNICATIONS**
3 **SERVICE THROUGHOUT THE NON-RURAL ILEC SERVICE AREAS**
4 **FOR WHICH IT SEEKS ETC DESIGNATION?**

5 **A:** Yes.

6 **Q: BEFORE DESIGNATING NEW DIMENSION AS AN ETC, IS THE**
7 **COMMISSION REQUIRED TO FIND THAT THE DESIGNATION IS IN**
8 **THE PUBLIC INTEREST?**

9 **A:** Yes.

10 **Q: HOW, AND IN WHAT TERMS, WILL NEW DIMENSION'S PRESENCE**
11 **AS AN ETC IN SOUTH CAROLINA AFFECT THE MARKET AS A**
12 **WHOLE AND THE PUBLIC INTEREST GENERALLY?**

13 **A:** A grant of New Dimension 's application will serve the public interest and the
14 market as a whole by promoting additional deployment of New Dimension's
15 unique local service. It is important to note that most of New Dimension's
16 customers do not meet the traditional "creditworthiness" test of ILECs and
17 CLECs, and therefore, many are unable to obtain wire line local exchange service.
18 New Dimension's designation as an ETC will bring consumers the benefits of its
19 unique service to a specific segment of the market.
20 Granting ETC status to New Dimension would allow the Company to obtain
21 federal universal service support, which it will use to offer innovative
22 telecommunications services at competitive prices to consumers in the Designated
23 Service Area.

1 **Q: IF NEW DIMENSION’S PETITION IS GRANTED, WILL THERE BE**
2 **ANY FINANCIAL IMPACT ON THE UNIVERSAL SERVICE FUND OR**
3 **THE FEDERAL UNIVERSAL SERVICE FUND SURCHARGE THAT**
4 **SOUTH CAROLINA END USERS PAY?**

5 **A:** No. In fact the amount of support available to an eligible subscriber is exactly the
6 same whether the support is given through a company such as New Dimension or
7 the Incumbent LEC operating in the same service area. As such designation of
8 New Dimension will not create any financial impact on the Universal Service
9 Fund, the Federal Universal Surcharge that South Carolina end users pay, or an
10 increase to the State or its political subdivisions.

11
12 **Q: HAS NEW DIMENSION BEEN GRANTED ETC STATUS BY ANY**
13 **STATE COMMISSIONS?**

14 **A:** **No.**

1

2 **Q: HAS NEW DIMENSION BEEN AUDITED BY USAC, OR ANY OTHER**
3 **ENTITY, PERTAINING TO LIFELINE AND LINK-UP?**

4 **A:** No.

5 **Q: DOES NEW DIMENSION AGREE TO COMPLY WITH ALL**
6 **COMMISSION RULES AND REGULATIONS REGARDING ETC,**
7 **INCLUDING THOSE SET FORTH IN DOCKET NO. 2006-37-C?**

8 **A:** Yes. Applicant hereby asserts its willingness and ability to comply with all the
9 rules and regulations that the Commission may lawfully impose upon Applicant's
10 provision of service contemplated by this application.

11 Applicant has requested ETC designation in wire centers located throughout, the
12 service area of AT&T, a non-rural carrier. Additionally, Applicant has limited
13 its requested USF support to the federal USF low income support program.

14 Applicant certifies that all low income USF funding it receives will be used to
15 provide a credit to its Lifeline and Link-up eligible customers, consistent with 47
16 CFR 54.403.

1

2

Applicant agrees to include in its quarterly Service Quality Report the number and

3

justification of applications held for more than 30 days and the number and

4

justification of applications that were denied. New Dimension will only seek

5

direct low income support from the Federal Universal Service Fund for the those

6

line provided through the use of its own facilities or through a combination of its

7

own facilities and the leased facilities of another carrier. Applicant agrees to

8

utilize the same qualifying criteria for Lifeline and Link-up as is offered in the

9

AT&T territory (eligibility for TANF, Food Stamps, and Medicaid). Applicant

10

agrees that it will abide by all advertising and reporting and verification

11

requirements established by the FCC and Commission.

12

Q: EXPLAIN HOW THE COMPANY'S RATES AND CHARGES ARE

13

COMPARABLE TO AT&T RATES AND CHARGES?

14

A: Applicant agrees to provide Lifeline customers an additional \$3.50 credit in order

15

that the federal matching monies can be maximized. This will yield a Lifeline

16

credit of \$13.50 per month which is consistent with the credit offered throughout

17

Designated Service Area.

18

1
2 Should Applicant seek designation as an ETC for high cost support, Applicant
3 will file an additional and separate application with the Commission that
4 addresses all applicable state and federal laws, rules and regulations, including,
5 but not limited to, an appropriate build-out plan that includes the use of its own
6 facilities in addition to those obtained through commercial agreements to provide
7 services to un-served areas.

8 Applicant shall submit a two-year plan that describes the carrier's plans for
9 advertising and outreach programs for identifying, qualifying and enrolling
10 eligible participants in the Lifeline and Link Up programs.

11 Applicant shall comply will all applicable state and federal laws, rules, and
12 regulations regarding ETC designation and reporting requirements.

13
14 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

15 **A:** Yes.

Exhibit A

Resume

Wayne A. Green
107 Spalding Circle, Goose Creek, SC 29445

(843) 270-4915 (Cell)
(843) 572-9328 (Work)

ndci@comcast.net

Accomplished, goal and result oriented owner of a Telecommunications company

QUALIFICATIONS

- 20+ track record as a Sole proprietor in business. I have dealt directly with the public meeting customer and client needs. As trends have changed within my markets I have the foresight and ability to change my business plan to adjust to changing markets.
- 10 years experience within the Telecommunications industry as owner with a hands on approach that has lead me from going to premises of customers and trouble shooting line trouble, customer service as a direct representative that dealt directly with customers on an in and out of office capacity, provisioning of lines, programming of billing programs and meeting with representatives of different commissions within telecommunications on a professional basis.
- Ability to train Service technicians to instill both telecommunication troubleshooting and excellence in customer service.
- Superb leadership, supervisory, interpersonal, communication and teaching skills.

PROFESSIONAL EXPERIENCE

New Dimension Communications, Goose Creek, SC 1998 – Present
Business Owner

Provide services which meet the service standards of the Department of Regulatory Staff in S.C. to provide intrastate local telecommunications services. Through my telephone company I have been able to offer service to many customers, at affordable rates, who were unable to otherwise obtain local service due to previous disconnections or substandard credit. I feel I have also increased competition, which in turn offers consumers in S.C. a wider range of product offerings, innovative technologies and improvements in the quality of service.

EDUCATION

Majority of telecommunications education has come by way of self-study, manufacturer's training, "on-the-job" training and certification courses through Bellsouth. Further training is ongoing.

Exhibit B


Affidavit

AFFIDAVIT

STATE OF SOUTH CAROLINA)
) SS.
COUNTY OF BERKELEY)

I, Wayne Green, being duly sworn upon oath, do hereby depose and state as follows:

1. My name is Wayne Green. I am employed by New Dimension Communications, Inc. d/b/a Fast Phones ("New Dimension") as President. My business address is 134 St. James Avenue, Unit 2, Goose Creek, South Carolina 29445. I am authorized by New Dimension to make this Affidavit on its behalf, and it is given upon my personal knowledge. This Affidavit is given in support of the company's application to be designated as an Eligible Telecommunications Carrier in Docket No. 2008-314-C.
2. On behalf of New Dimension, I declare the following:
 - (A) New Dimension will provide Lifeline and Link-up service in a timely manner throughout its designated service area upon reasonable request of an eligible consumer;
 - (B) New Dimension will offer the services that are supported by the federal universal service support mechanisms by using its own facilities or a combination of its own facilities and resale of another carrier's services;
 - (C) New Dimension will advertise in media of general distribution the availability of lifeline and link-up services and the applicable charges for such services.
 - (D) New Dimension will file a two -year advertising and outreach plan as required by the Commission promulgated rules prior to offering Life-Line and Link-up Services in the State of South Carolina.
 - (E) New Dimension acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.
 - (F) New Dimension will provide service within a reasonable period of time, if the potential customer is within its licensed service area but outside its existing network coverage, if service can be provided at reasonable cost.


Wayne Green, President
New Dimension Communications, Inc. d/b/a Fast Phones

Subscribed and sworn to before me this 13 day of November, 2008.

Notary Public

My Commission expires: October 14, 2017

Exhibit C

Two-Year Advertising Plan

LIFELINE AND LINK UP
ADVERTISING AND OUTREACH PLAN
Of
NEW DIMENSION COMMUNICATIONS, INC. D/B/A FAST PHONES
FOR THE
STATE OF SOUTH CAROLINA

NEW DIMENSION COMMUNICATIONS, INC. D/B/A FAST PHONES

TABLE OF CONTENTS

SUMMARY	3
BACKGROUND	3
ADVERTISING AND OUTREACH PLAN.....	3
I. Advertising and Outreach to Existing Customer Base	4
II. Advertising and Outreach to New Customers	4
A. Web Based	4
B. Governmental Agencies	5
C. Print Media	5
D. Broadcast Media	6
III. Qualification and Enrollment	6
IV. Verification of Continued Eligibility	7

SUMMARY

New Dimension Communications, Inc. d/b/a Fast Phones has developed this Advertising Plan (the "Plan") in compliance with Chapter 103-690 of the South Carolina Code of Regulations (Unannotated), which requires carriers who are "seeking ETC designation for the purposes of participation in the Lifeline and Link Up programs" to "submit a two-year plan that describes the carrier's plans for advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in the lifeline and Link Up programs". In accordance with state and federal requirements, New Dimension will "Publicize the availability of Lifeline service in a manner reasonable designed to reach those likely to qualify for the service"¹.

Implementation of the Company's Advertising Plan will commence upon designation as an Eligible Telecommunications Carrier ("ETC") and will continue for a term no less than twenty-four (24) months from the date that the approval order becomes effective.

BACKGROUND

New Dimension Communications, Inc. d/b/a Fast Phones ("New Dimensions", the "Company") is an South Carolina Corporation² and is authorized to conduct business as a foreign corporation in the State of South Carolina. New Dimension was granted a Certificate of Public Convenience and Necessity to Provide Competitive Local Exchange Telecommunications Services within the State of South Carolina Pursuant to Order No. 2004-421 issued in Docket No. 2004-59-C on September 3, 2004. The Company's principle office is located at 134 St. James Avenue, Unit 2, Goose Creek, South Carolina 29445.

New Dimension provides local exchange and exchange access service in the AT&T exchanges of South Carolina using a combination of resale and unbundled network elements (UNEs) or unbundled network element equivalents obtained through agreements with the underlying carrier. These agreements allow the Company to provide end-to-end switching and delivery of calls.

ADVERTISING AND OUTREACH PLAN

The Advertising and Outreach Plan of the Company is structured to promote maximum visibility of the Lifeline and Link Up programs throughout the State of South Carolina. New Dimension will use advertising mediums that have a proven track record of effectively identifying, informing, and educating current and potential subscribers of the Lifeline and Link Up programs thereby increasing consumer awareness and the overall penetration of Lifeline and Link Up subscribership in South Carolina. The Company will begin implementation of its Advertising and Outreach Plan throughout the AT&T exchanges in the State of South Carolina upon designation as an ETC, which will continue for a period of no less than 24 months.

¹ CFR 47 § 54.405(b)

² New Dimension was incorporated in the State of South Carolina on May 19, 1995

I. Advertising and Outreach to Existing Customer Base

Upon designation as an Eligible Telecommunications Carrier (“ETC”) in the State of South Carolina, New Dimension will implement its Advertising Plan by contacting the Company’s existing customer base.

This goal of this phase of the Advertising Plan will be two-fold. The first goal is to inform existing customers not only of the availability of Lifeline and Link Up, but also of the savings that eligible consumers can anticipate.

The second goal is to educate customers as to the eligibility requirements for participation in the Lifeline and Link Up programs.

To accomplish these goals, New Dimension will utilize USACs Consumer Outreach Lifeline and Link Up letter, a copy of this which is included with this Plan and is labeled as Attachment 1. A copy of this notification will be included by the Company as a billing insert. Approximately 30 days after the billing insert has been sent, New Dimension will send a stand-alone notice of the same, via U.S. mail, to each active non-responding customer.

Approximately 60 days after the billing insert has been sent, the Company’s customer service representatives will begin contacting customers who have not responded to either mailing in an effort to make the existence of and the eligibility requirements for this vital low-income program known.

New Dimension anticipates that the expected implementation period for this phase of the Company’s Advertising Plan to will take approximately three (3) months.

II. Advertising and Outreach to New Customers

A. Governmental Agencies

New Dimension will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs and cater to those likely to qualify for support. Currently, the Company’s advertising plans call for it to coordinate advertising and outreach efforts with organizations such as:

Social Service Agencies
Community Centers
Local Counsel on Aging Centers
United Way
AARP

Implementation of this phase will begin upon completion of the Company's Outreach to its existing customer base and will be ongoing in nature. New Dimension expects that it will take approximately twelve (12) months to make outreach materials fully available throughout the designated service area.

B. Print Media

New Dimension will begin print advertising using a media of general distribution. Specifically, the Company will begin by advertising the availability of Lifeline and Link Up in the designated area through free publications such as the Dollar Saver and Thrifty Nickel. These publications, and others like it, are available without cost or subscription requirements and are widely distributed throughout the State of South Carolina. As such, New Dimension believes that this form of advertisement to not only be effective but is consistent with the requirements of §54.405 and 54.411, which require ETCs to publicize the availability of Lifeline and Link Up service in a manner reasonable designed to reach those likely to qualify for the support.

Implementation will begin upon completion of the Company's Governmental Outreach campaign and will take approximately six (6) months to fully implement in all of the designated service area. Once in place, New Dimension will continue its print media advertisement on an ongoing basis.

C. Broadcast Media

New Dimension will implement a brisk and consistent broadcast advertising campaign throughout South Carolina. Implementation of this phase of the Company's advertising and outreach campaign will commence with advertising on broadcast TV stations in lieu of cable TV due to the lack of low-income viewership.

Current broadcast plans call for the Company to begin advertising on broadcast TV stations throughout the State of South Carolina. In addition, the Company will specifically target stations with affiliate TV and Radio stations.

Implementation will begin upon completion of the Company's Print Media Campaign. New Dimension anticipates that it will take approximately six (6) months to fully implement its Broadcast Outreach in all of the designated service area. Like the Company's print media campaign, New Dimension anticipates that its broadcast advertising campaign will continue unabated.

III. Qualification and Enrollment

Lifeline is a program that provides eligible consumers with a monthly recurring discount, off of the rate for basic local exchange service, of up to \$13.50.

Link Up provides eligible consumers with a 50%, up to \$30.00, off of the cost associated with connecting local exchange service.

Consumers are eligible for Lifeline and Link Up support if they participate in one of the following State approved needs-based programs:

- Food Stamps
- Medicaid
- Family Independence (TANF)

New Dimension has developed a compliance manual, which provides detailed information of the specific requirements for eligibility in Lifeline and Link Up on a state-by-state basis.

All advertising and outreach materials will direct consumers to call New Dimension at toll free (843) 572-9328. The Company's customer service representatives will assist consumers to determine if they are eligible for Lifeline and Link up benefits. When a customer is deemed eligible, representatives will send, by fax, email, or U.S. mail, a copy of the Company's self-certification form. This form allows customers to self-certify, under penalty of perjury, that they meet the need-based eligibility requirements of the State. In addition, New Dimension requires all customers to provide documentation of proof of eligibility, which can be in the form of a copy of the customers Medicaid card, Food Stamp card, or certification from the appropriate State Department. Eligible customer accounts will be enrolled in Lifeline and applicable Lifeline and Link Up credits will be provided after proof of eligibility has been received by the Company.

IV. Verification of Continued Eligibility

The FCC has recommended that all states, including federal default states, be required to establish procedures to verify a consumers' continued eligibility in the Lifeline program under Program Based or Income Based Eligibility criteria, which could include, but would not necessarily be limited to, random beneficiary audits, periodic submission of documents, or annual self-certification. However, to date, no clear-cut method of verification has been established. For example, in some states, the ETC is responsible for verifying the consumer's continued eligibility, while other states require their state agencies to devise procedures for eligibility verification. Still another state establishes eligibility verification procedures that involve state agency and carrier participation.

As such, New Dimension has elected to follow the FCC's recommendation that ETCs be required to verify annually the continued eligibility of a statistically valid sample of their Lifeline subscribers. Under this program, ETCs are free to verify directly with a state that particular subscribers continue to be eligible by virtue of participation in a qualifying program or income level. Alternatively, to the extent ETCs cannot obtain the necessary information from the state, they may survey the subscriber directly and provide the results of the sample to USAC.

Subscribers who are subject to this form of verification and who qualify under Program Based Eligibility criteria must prove their continued eligibility by presenting in person or sending a copy of their Medicaid card or other Lifeline-qualifying public assistance card and self-certifying, under penalty of perjury, that they continue to participate in the Lifeline-qualifying public assistance program.

Subscribers who are subject to this form of verification and who qualify under the Income Based Eligibility criteria must prove their continued eligibility by presenting current documentation consistent with the federal default certification process. These subscribers must also self-certify, under penalty of perjury, the number of individuals in their household and that the documentation presented accurately represents their annual household income.